

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: :
: Case No.: 17-10177(MDC)
Felecia N. Harcum :
: Chapter 13
Debtor(s) :

AMENDED
MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Felecia N. Harcum, by and through her undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtors filed a Chapter 13 Bankruptcy on or about January 10, 2017.
2. The Chapter 13 filing was assigned case number 17-10177-MDC.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about December 14, 2017.
4. On or about May 19, 2020 the Chapter 13 Trustee filed a Motion to Dismiss for Failure to Make Payments.
5. Due to COVID-19, Debtor was unable to make complete payments to the Chapter 13 Trustee due to decreased hours.
6. The Debtor has now returned to full-time employment and is desirous of making regular and timely monthly payments for the remainder of her bankruptcy.
7. In furtherance of the Motion and the Debtor curing the delinquency, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.
8. The Debtor's proposed modified Chapter 13 Plan, attached hereto as "Exhibit A", is affordable by the Debtor.

WHEREFORE, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above-stated reasons.

Dated: July 28, 2020

/s/Brad J. Sadek, Esq.

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